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Governor

JUL 31 2000

FCC MAIL ROOM

STATE OF ARKANSAS

DEPARTMENT OF INFORMATION SYSTEMS

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DON MELTON
Director

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July 21, 2000

Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: Docket 99-200 (FCC Order Number FC 00-104)

Dear Commissioners:

The State of Arkansas, Department of Information Systems as the provider of telecommunications goods and services for offices of Arkansas government, universities, local governments, and school districts, has grave concerns regarding the proposed Order. We view that the Order, in its present form, will greatly harm our ability to cost-effectively deliver services to our constituency. We see our situation as common across the nation for any equivalent class of large business or government customers.

The ability to reserve numbers for a longer than 45-day period is a critical and important issue for Arkansas state government. Reserved numbers permit state governments to meet the special needs of a large, unique and diverse community. Further, we see that our ability to deliver service in a timely manner will be seriously diminished. Today, we are able to simply assign a number from a pre-assigned pool to rapidly deliver critical services. We see the 45-day and 5-day rules as being inappropriate for our applications. For normal orders, the five-day rule will routinely cause a change of number during installation cycle since we typically experience much longer installation cycles from our LECs. Large projects with hundreds of phones will always take more than the 45 days allowed under your number "Reservation". Installations such as this will always have a public awareness component of directory, advertising, stationery, and business card publishing that cannot tolerate number changes.

The State of Arkansas is in the process of growing the state's telecommunications network. Currently there are 20,000 lines in central Arkansas. This number will increase as the network grows.

Centrex provides attractive acquisition and operational costs, no per-call charge for calls within the system and an implicit awareness of "internal stations". Employees and constituents alike recognize the state as its own "community" within an exchange area.

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For nearly 15 years, for example, the public in Arkansas has “known” that a 682/686 number was “the state”. The introduction of a jumble of NXX codes and the dilution of others as numbers are assigned to state government would tear apart that community as unfamiliar numbers are assigned to state government and new users of the old numbers endure calls meant for a state agency. There is potential of a new user acquiring numbers formerly belong to the state and posing as a representative of the state. This represents a risk of losing constituent confidence and trust in their state government.

The FCC order as it now is written would harm that state’s ability to provide a recognizable service to its customers. As a large volume user providing Centrex services to state agencies, universities, local governments, and school districts. Through multiple service providers, this department relies heavily on being able to maintain a number block concept for the simplification and efficiency of our consolidated support systems. Processes, such as billing, inventory, trouble reporting and resolution, stand to be negatively affected if numbers are no longer reserved by the State for assignment within a logical sequence based on the state Centrex user.

Second, the ability of the state governments across the country to manage and administer their telecommunications resources would be limited as the FCC’s order is now written. The current arrangement allows for more efficient management of the multiple tables (e.g. station, restriction, feature, long distance, call routing, and billing) that govern the systems’ use.

By fragmenting the numbering resource, mistakes and errors in billing could increase, leading to higher administrative costs to uncover and correct those mistakes.

Arkansas State government has contractual relationships with their carriers. It is with these contracts that dramatically improved discounts are obtained on behalf of state agencies. Since the states buy in bulk, carriers can offer correspondingly large discounts.

While we fully appreciate the Commission’s authority and responsibility to efficiently administer the NANP, we believe the rules as presently drafted fail to acknowledge the uniqueness of large government and business clients served by Centrex services. As written, they seem to provide a prejudicial advantage to PBXs using DID services. We would implore that such inequities and potential inefficiencies are resolved. It is of utmost importance that you postpone the effective date of the requirement stated in Docket 99-200 (FCC Order Number FC 00-104). This requirement will adversely affect the ability of Arkansas State Governments to plan and implement major agency moves.

Federal Communications Commission

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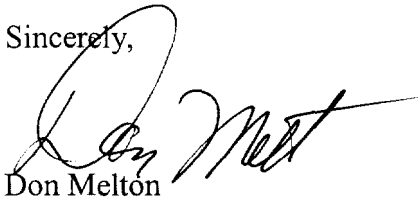
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Such moves are often delayed by a variety of factors and therefore there is a requirement to be able to reserve numbers for longer than 45 days.

We urge you to continue to work with the RBOCs and other telecommunications providers to study and amend this Order Number to better serve the customer base, your constituents.

Thank you for your prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Melton", is written over the word "Sincerely,".

Don Melton

DM/SDC/dh